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PLAINTIFFS TRIAL
EXHIBIT
P-07036_00001

Walmart
Save money. Live better.
Sam's Club
January 2, 2014
Health & Wellness
Compliance Focus Areas
Steering Meeting
Walmart Compliance
The Right Way,
Every Day!
Service • Respect • Excellence

Agenda

- Review previous action items
- Work stream reporting – remember: focus on barriers, barrier removals
  - ❑Accessibility — Doug Elms
  - ❑Billing — David Badeen / JoAnn Stevens
  - ❑Fulfillment — Brandon Worth/George Chapman
  - ❑HIPAA — Tariq Abdullah
  - ❑Pricing — Karen Bond
  - ❑Enablement — James Dougan / Gary Knox
  - ❑Controlled Substances — George Chapman / Tim Harris
  - ❑Health Services — Jennifer LaPerre
  - ❑Merchandising — Sandy Kinsey /Julie Stroud
- Discuss new/emerging risks and next steps
- "CEO" of the week award

Actions Log	Responsible	Due
VSP and ODs **Call to VCM's to ensure their success in meeting expectations.**	Lynn Cowie	1/2/14
Medicare/Medicaid **Document revised and agreed upon scope for ISD project plan.**	James Dougan	1/2/14
EPCS **Establish project (people, process, technology). Connecting Sam's / WMT Operations for drop-off process and Practice Compliance for policy/procedure impacts**	Jeff Brown	1/2/14
Counseling, Ph II **Address budget ask for hardware in the WMT Pharmacy.**	Doug Elms	1/2/14
Bagging **Address budget ask for Printers (2 stores). Provide denial notes to Jim Langman.**	Lynn Cowie	1/2/14
Upcoming Spotlights: ○ PR Merch Assessment ○ Clinics	 S. Kinsey Jennifer LaPerre	 1/30/14 1/23/14

Focus Areas DashBoard

Work Group	Project Name	Project Purpose	Owner	Project Due Date	Overall Status
Accessibility	Braille Label	Roll out Braille Label at Mail Order facilities.	Doug Elms	Q2 FY 14	Complete!
	Kamal Agreement	Complete all required obligations established within the Kamal agreement.	Doug Elms	Q4 FY 16	G
Billing	COB/ Switch to Cash	(1) System logic to ensure that Medicaid is payer of last resort (2) enable the switch to cash function to be more viable at store level	David Badeen	Q4 FY14	Y
	Claims Field Study	(1) Establish sustainable process to maintain 50-state Medicaid requirements of specific data fields (2) Understand how those field are used (3) update operational processes and systems	Erica Rochelle	Q4 FY 14	TBD
	Medicare Part B Billing	Systematic approach to billing Medicare B Billing and other Medical billing processes	Clint Clark	Q2 FY15	Y
	Optical Medicaid	(1) Maintain Medicaid provider numbers for optical MCO and FFS government billing. (2) Compliantly bill Optical Medicaid claims	Laura Levine	TBD	Y
Fulfillment	Bagging Solution	A redesign of the bagging queue to create efficiency and HIPAA compliance gains	Brandon Worth	Q3 FY14	Y
	State Compliance	React/Respond to state level compliance	Rick Irby	Q4 FY 14	G
	Class 1 Recalls	Align with company Recalls solution	Dadrion Gaston	Q1 FY14	TBD
	Scheduling Compliance	Maintain pharmacy : technician ratios by state	Mike Peerson		Cancelled
	Counseling Ph II	Deliver efficient & effective way to document the acceptance or refusal of patient counseling real time.	Rick Irby		R

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Focus Areas DashBoard

Work Group	Project Name	Project Purpose	Owner	Project Due Date	Overall Status
HIPAA	Access Logs, Ph 1	Implement access logs and monitoring for Connexus and specific backend pharmacy systems	Laura Gannan	Q2 FY 14	**Complete!**
	HITECH – Cash Pay Restriction	Implementation of HITECH 3 requirements - restriction on cash pay disclosures	Laura Gannan	Q2 FY 14	**Complete!**
	Encryption – Connexus	To ensure ConnexUs data is properly encrypted at rest and in transit	Laura Gannan	Q4 FY 14	**G**
	HITECH – Electronic Access	Implementation of HITECH 3 requirements - electronic access to PHI for patients	Laura Gannan	Q4 FY 14	**G**
Pricing	WV Pricing	Update systems for WV pricing compliance	Karen Bond	Q2 FY 14	**Complete!**
	Accurate Pricing	Modify GPH & Connexus to ensure accurate costs and retails on Rx & non-legend items in GPH and in Connexus at store level.	Karen Bond	Q4 FY 14	**G**
Technology Enablement	Data Strategy	Develop automated a process to bring claims activity to the HO in "real-time"	Darren Townzen	Q4 FY 14	**R**
	Diversion Analytics	Deliver static and ad hoc reporting capability to monitor diversion in stores and clubs	Greg Beam	Q4 FY 14	**R**
	Release Schedule	Annual Plan for ConnexUs releases	James Dougan	Q4 FY 14	**R**
	HW Compliance BI	Develop BI capability for HW Compliance	Maria Smith	N/A	**Cancelled**
	Ready Alerts	Eliminate legal and compliance risks from the current messaging platform	Gary Knox	TBD	**G**

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Focus Areas DashBoard

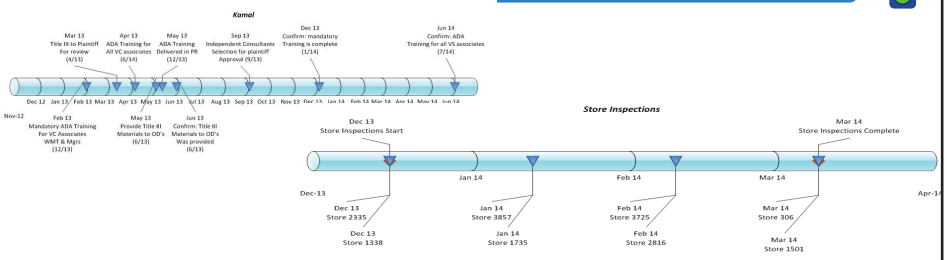
Work Group	Project Name	Project Purpose	Project Leader	Project Due Date	Overall Status
Controlled Substances	Suspicious Order Identification, Monitoring, and Reporting (SOMP)	Design & operate a systems to detect suspicious orders and report to the DEA when discovered	Kristy Spruell	Q2 FY 15	G
	Maximum order limits (SOMP)	Establish additional maximum order limits of highly abused drugs	Kristy Spruell	Q2 FY 15	G
	Prescriber validation	Enhance or replace or current vendor prescriber data source to ensure accuracy & completeness of data	Darren Townzen	Q1 FY 15	G
	Refusal to Fill	Establish a process for the analysis of refusal to fill data and reporting problematic prescribers or patients internally	Brad Nelson	Q1 FY 15	G
	Security Cameras CCTV - Pharmacy	Establish a remediation plan regarding our CCTV standards to meet our obligations with DEA MOA	Teresa Mahavier	Q2 FY15	G
	Corporate Processes	Create an advisory panel to facilitate the evaluation, implementation and accountability for risk assessment recommendations	Tim Koch and Shelley Tustison	Q4 FY 14	G
	POM updates & Revisions	Complete suggested updates to POM's to ensure consistency in execution	Tim Koch and Shelley Tustison	Q2 FY 14	G

Focus Areas DashBoard

Work Group	Project Name	Project Purpose	Owner	Project Due Date	Overall Status
Health Services	Immunizations	Compliant execution of Immunization program.	JoLynn Coleman	Q4 FY 14	**TBD**
	MTM		JoLynn Coleman	TBD	
	Clinics		Jennifer LaPerre	TBD	
PR Merchandising	Merchandising Assessment	ID gaps in PR RX procurement processes (categorized as Compliance/Operational/ Financial risks)	Sandy Kinsey	TBD	**G**
	PR Pricing Assessment	ID gaps in PR RX pricing processes (categorized as Compliance / Operational / Financial risks)	Karen Bond	Q4 FY 14	**Complete!**
	PR Billing Assessment	ID gaps in PR RX billing processes (categorized as Compliance / Operational / Financial risks)	David Badeen	Q4 FY 14	**Complete!**
	PR Diversion Assessment	ID gaps in PR RX drug diversion risk	Greg Beam	TBD	**TBD**
	PR Recalls	ID gaps in PR RX/OTC product recall processes	Dadrion Gaston	Q4 FY 14	**TBD**

This is our vision…

Accessibility: Kamal



Measure of Success & Deliverables

Success Measures/Purpose

- Fulfill all obligations of Kamal agreement

Key Deliverables (**Italics = completed)*

- *Determine scope of work for VC hard 2 door states (ETC 11/15)*
- 8 Store Inspection by independent consultants to begin Dec. 13th
- Construction remediation for remaining VCs in chain to begin in 2014. Store schedule being developed.

Updates

Current Week:

- 59 Kamal Locations to be completed by 3/1/14.
- Jeff Waggener waiting on response from Jeff Brown on determination for funding for remaining projects

Prior Week:

- 8 store inspection of VC's by 3rd party consultants to begin 12/18.
- It is anticipated that we will receive the first report from the inspection approximately 2 weeks from each inspection scheduled.
- Consultant has begun selection process for the next 22 sites to be inspected and should be published to WMT within 30 days.
- Payment for consultant fees to be finalized by 12/20.

Challenges

Current Week:

Request for project funding presented to leadership

Prior Week:

- none.

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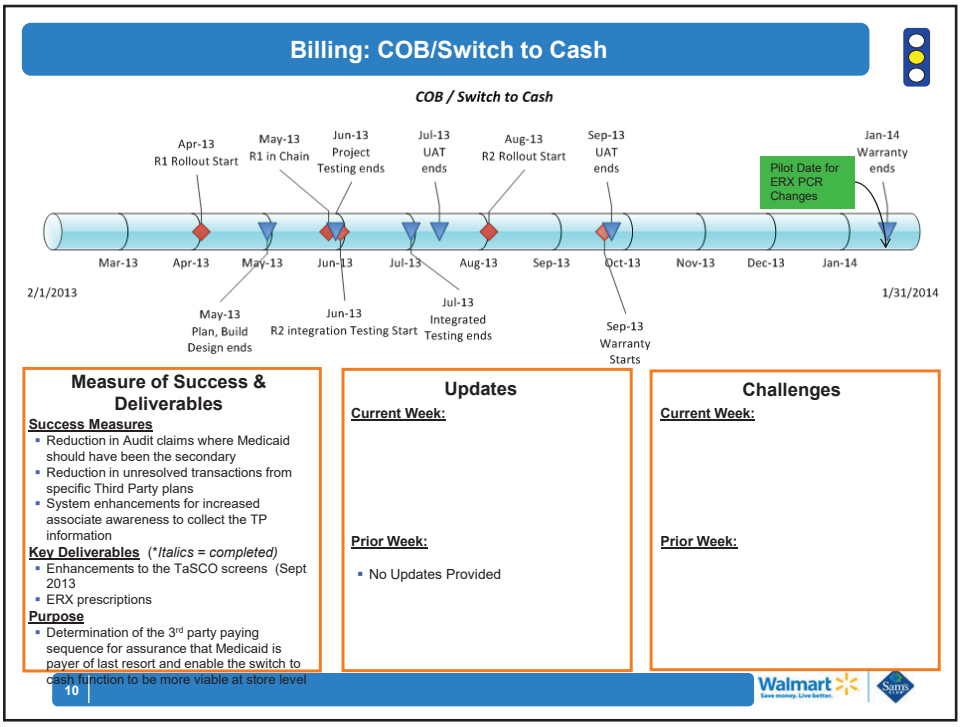
Billing: COB/Switch to Cash



Measure of Success & Deliverables

Success Measures

- Reduction in Audit claims where Medicaid should have been the secondary
- Reduction in unresolved transactions from specific Third Party plans
- System enhancements for increased associate awareness to collect the TP information

Key Deliverables (**Italics = completed)*

- Enhancements to the TaSCO screens (Sept 2013
- ERX prescriptions

Purpose

- Determination of the 3rd party paying sequence for assurance that Medicaid is payer of last resort and enable the switch to cash function to be more viable at store level

Updates

Current Week:

Prior Week:

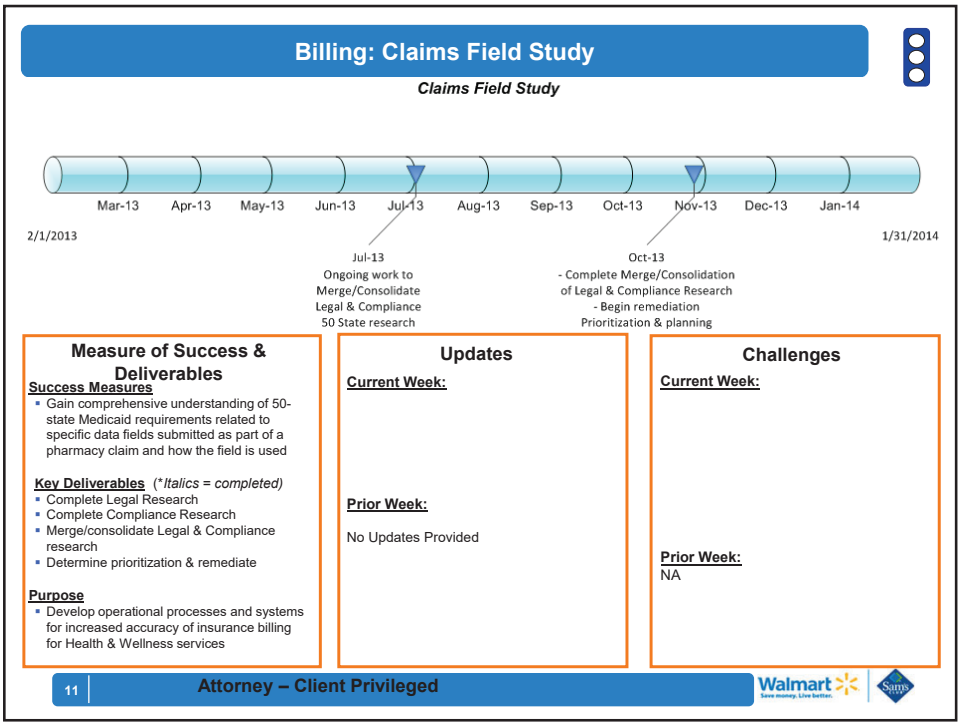
- No Updates Provided

Challenges

Current Week:

Prior Week:

10


Billing: Claims Field Study
Claims Field Study
Mar-13
Apr-13
May-13
Jun-13
Jul-13
Aug-13
Sep-13
Oct-13
Nov-13
Dec-13
Jan-14
2/1/2013
1/31/2014
Jul-13
Ongoing work to Merge/Consolidate Legal & Compliance 50 State research
Oct-13
- Complete Merge/Consolidation of Legal & Compliance Research
- Begin remediation Prioritization & planning
Measure of Success & Deliverables
Success Measures
Gain comprehensive understanding of 50-state Medicaid requirements related to specific data fields submitted as part of a pharmacy claim and how the field is used
Key Deliverables (*Italics = completed)
Complete Legal Research
Complete Compliance Research
Merge/consolidate Legal & Compliance research
Determine prioritization & remediate
Purpose
Develop operational processes and systems for increased accuracy of insurance billing for Health & Wellness services
Updates
Current Week:
Prior Week:
No Updates Provided
Challenges
Current Week:
Prior Week:
NA
11
Attorney – Client Privileged
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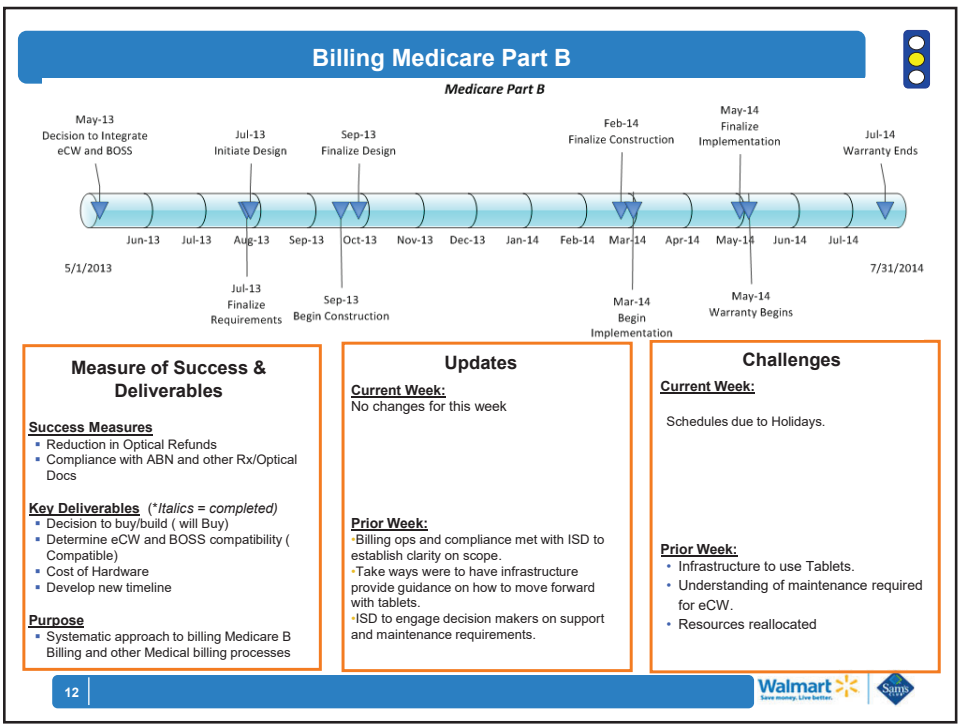
Billing Medicare Part B



Measure of Success & Deliverables

Success Measures
- Reduction in Optical Refunds
- Compliance with ABN and other Rx/Optical Docs

Key Deliverables (**Italics = completed)*
- Decision to buy/build (will Buy)
- Determine eCW and BOSS compatibility (Compatible)
- Cost of Hardware
- Develop new timeline

Purpose
- Systematic approach to billing Medicare B Billing and other Medical billing processes

Updates

Current Week:
No changes for this week

Prior Week:
- Billing ops and compliance met with ISD to establish clarity on scope.
- Take ways were to have infrastructure provide guidance on how to move forward with tablets.
- ISD to engage decision makers on support and maintenance requirements.

Challenges

Current Week:

Schedules due to Holidays.

Prior Week:
- Infrastructure to use Tablets.
- Understanding of maintenance required for eCW.
- Resources reallocated

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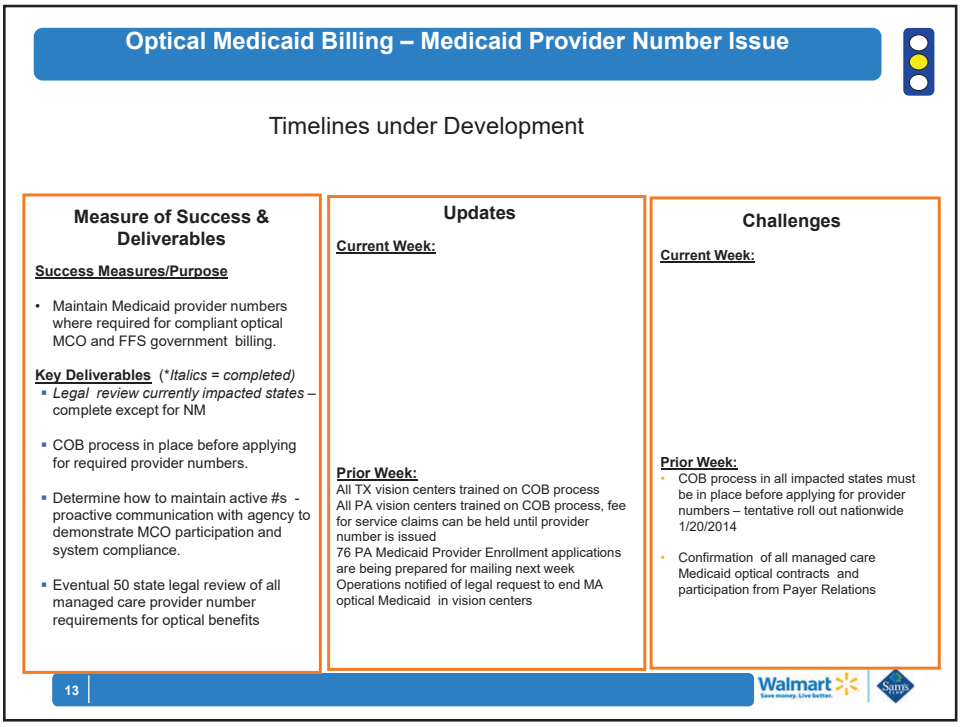
Optical Medicaid Billing – Medicaid Provider Number Issue
Timelines under Development
Measure of Success & Deliverables
Success Measures/Purpose
• Maintain Medicaid provider numbers where required for compliant optical MCO and FFS government billing.
Key Deliverables (*Italics = completed)
▪ Legal review currently impacted states – complete except for NM
▪ COB process in place before applying for required provider numbers.
▪ Determine how to maintain active #s - proactive communication with agency to demonstrate MCO participation and system compliance.
▪ Eventual 50 state legal review of all managed care provider number requirements for optical benefits
Updates
Current Week:
Prior Week:
All TX vision centers trained on COB process
All PA vision centers trained on COB process, fee for service claims can be held until provider number is issued
76 PA Medicaid Provider Enrollment applications are being prepared for mailing next week
Operations notified of legal request to end MA optical Medicaid in vision centers
Challenges
Current Week:
Prior Week:
• COB process in all impacted states must be in place before applying for provider numbers – tentative roll out nationwide 1/20/2014
• Confirmation of all managed care Medicaid optical contracts and participation from Payer Relations
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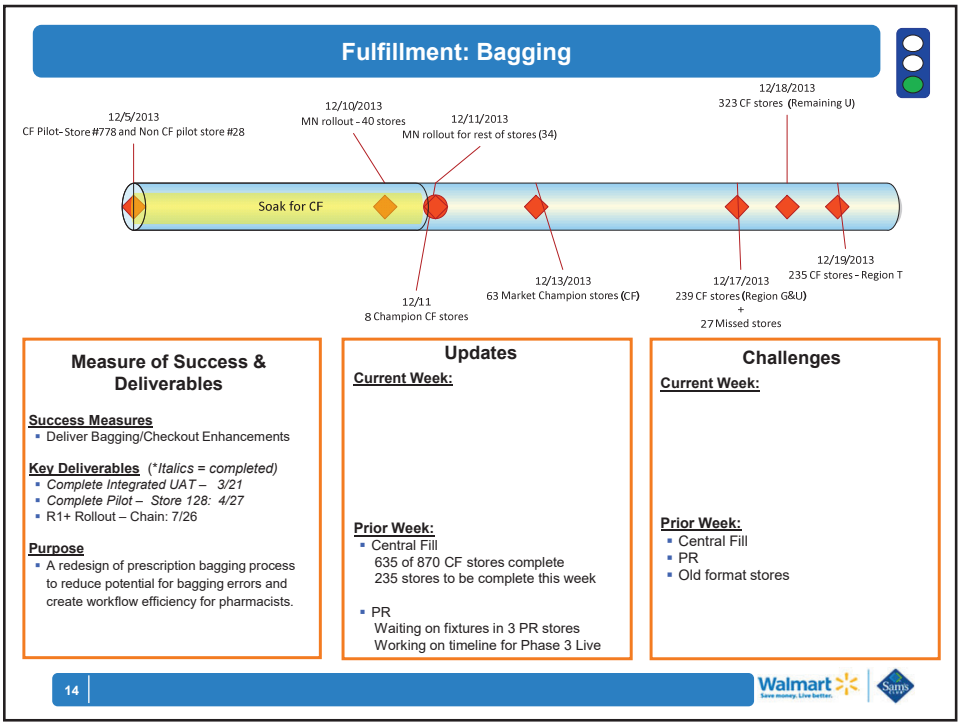
Fulfillment: Bagging
12/5/2013
CF Pilot- Store #778 and Non CF pilot store #28
12/10/2013
MN rollout - 40 stores
12/11/2013
MN rollout for rest of stores (34)
12/18/2013
323 CF stores (Remaining U)
Soak for CF
12/11
8 Champion CF stores
12/13/2013
63 Market Champion stores (CF)
12/17/2013
239 CF stores (Region G&U)
+
27 Missed stores
12/19/2013
235 CF stores - Region T
Measure of Success & Deliverables
Success Measures
Deliver Bagging/Checkout Enhancements
Key Deliverables (*Italics = completed)
Complete Integrated UAT – 3/21
Complete Pilot – Store 128: 4/27
R1+ Rollout – Chain: 7/26
Purpose
A redesign of prescription bagging process to reduce potential for bagging errors and create workflow efficiency for pharmacists.
Updates
Current Week:
Prior Week:
Central Fill
635 of 870 CF stores complete
235 stores to be complete this week
PR
Waiting on fixtures in 3 PR stores
Working on timeline for Phase 3 Live
Challenges
Current Week:
Prior Week:
Central Fill
PR
Old format stores
14
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Bagging: Non-Bagging Store Overview

Stores Not Live with Bagging Phase 3 as of December 3rd, 2013

Store Type Gap	Store Count	Root Cause	Owner	Solution	Timeline
Central Fill	234	UAT Facility unable to test	James Dougan	Enable 9083 to test Central Fill	19-Dec
Minnesota	0	Double 4pt Check	James Dougan	Schedule Date	11-Dec
One Printer	2	Capital Funding	TBD	Order Printer	TBD
	2	Installation	Doug Elms	Cabling	29-Nov
	0	Installation	Doug Elms	Printer Installation	TBD
Puerto Rico	3	Fixtures	Brandon Worth	Receive Fixtures	TBD
	4	Fixtures	James Dougan	Turn on Bagging Ph2	5-Dec
	22	Fixtures	James Dougan	Turn on Bagging Ph3	TBD
Layout	3	Layout has no room for hanging bags inside the pharmacy	Doug Elms	Remodel	2 Stores FY14 Remodel 1 Store TBD
Total Stores:	*270*				

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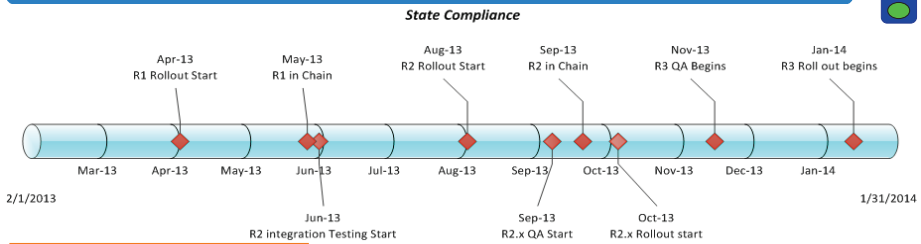
Fulfillment: State Compliance



Measure of Success & Deliverables

Success Measures

- Ability to respond the state specific compliance obligations

Key Deliverables

In R2.X:

- MA CII Out of State Prescriber (flag on),
- OK Hydrocodone

In R3

- CF and Modify Detail Screen
- Bagging Phase III Business Summary
- Bagging Phase III Detail report
- Bagging Phase III Activity Log (backend)
- Medicare CMS Drug Rights / Drug Notice
- CF RTS
- TN Opioids and Benzodiazepines
- CT leaflet/STR

Updates

Current Week (Totals to Date):

Total projects submitted	83
Projects in process	27
Projects in queue	11
Projects complete	45

Projects/LOE

- OK PSE Attestation
- Auto Refill in Mail Order (Backend)
- Suboxone Rxs and XDEA #
- WY CII 6 Month Expiration
- NY Sam's Clubs Hydrocodone On-Hands
- Elimination of Yellow Paper Log Copies
- Prescription Dispense Date Discrepancies
- Automated Reports Printing in NY Stores
- Auto Refill in Mail Order (Frontend)

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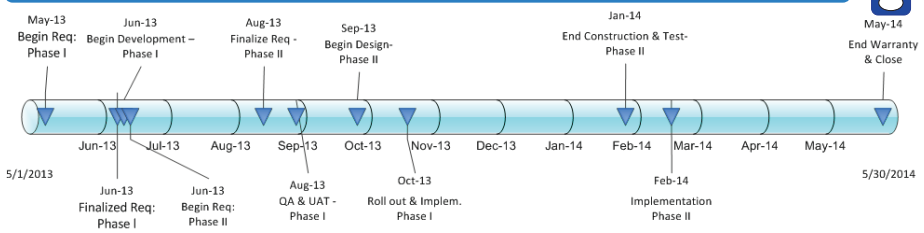
Fulfillment: Class I Recalls



Measure of Success & Deliverables

Success Measures

Implement a H&W Recall process in 2 phases to align all recall processes from supplier to patient notifications with total company and enable the business to satisfy our regulatory requirements through connectivity between ConnexUs and Product Removal system resulting in automation of the ConnexUs patient query

Key Deliverables (**Italics = completed)*

- H&W Product Removal Form: Phase I In UAT & QA phase on track for implementation by Oct 31st
- Phase II: In construction phase with implementation planned for end of Feb. 2014

Updates

Current Week:

Prior Week:

- No Updates Provided

Roadblocks

Current Week:

Prior Week:

ISD resource constraints.

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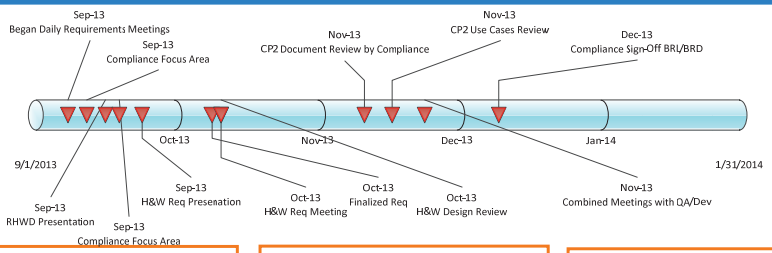
Fulfillment: Counseling – Phase II



Measure of Success & Deliverables

Success Measures

- Deliver efficient & effective way to document the acceptance or refusal of patient counseling real time.

Key Deliverables (**Italics = completed)*

- Will be in the 1402 Release
- Milestones to follow

Updates

Current Week:

Prior Week:

- Finalizing sign off on BRL/BRD
  - Responding to Operations queations
- Weighing options of splitting project into a 1402 and 1403 deliverable
- Re-baseline for pathway to Green

.

Challenges

Current Week:

Prior Week:

- What can be delivered in 1402?
  - Full Project **minus** – Counseling Station
- What can be delivered in 1403?
  - **Addition** of Counseling Station
- What are the Compliance concerns?
  - None
- What are the Operational concerns?
  - Guaranteed speed of login and access to Connexus

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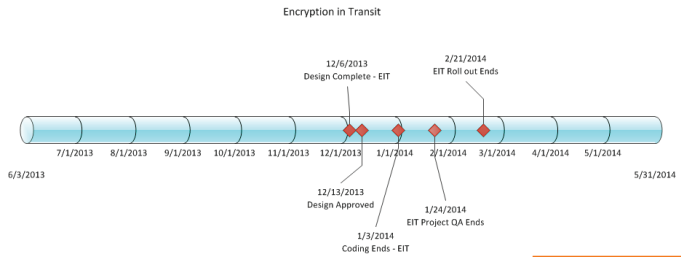
HIPAA: Encryption In Transit - Pharmacy



Measure of Success & Deliverables

Success Measures
- Remediate data streams specified by security in the pharmacy space.

Key Deliverables (**Italics = completed)*
- EIT Design Complete – 12/13/2013
- Code Complete – 1/03/2014
- Project QA Complete – 1/24/2014
- In Chain 2/21/2014

Purpose
- Secure our data in transit and at rest

Updates

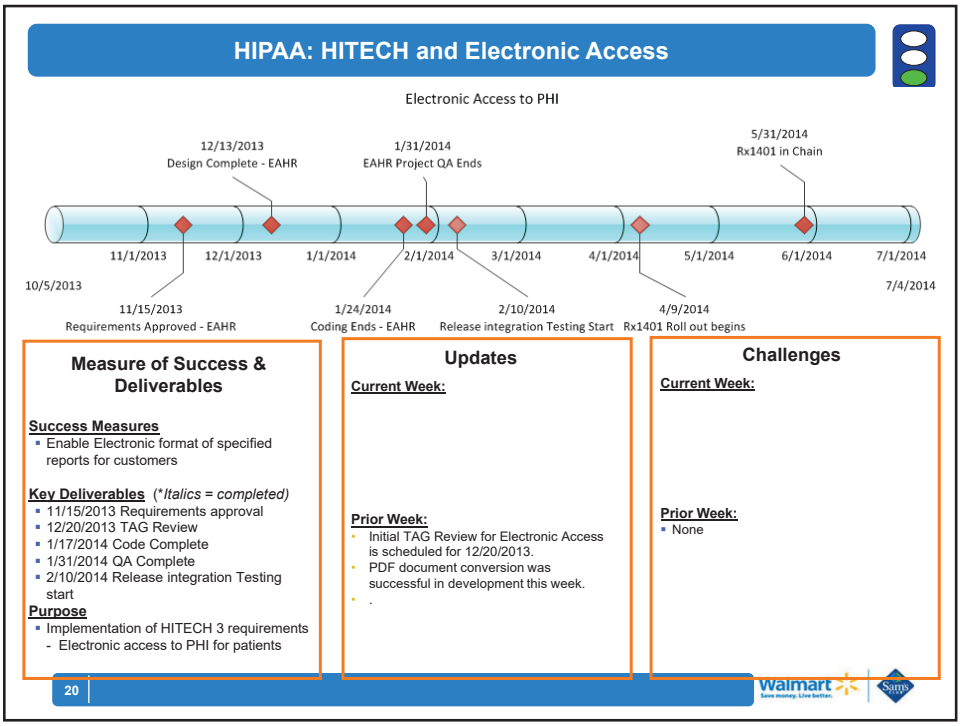
Current Week:

Prior Week:
- Construction is on track for EIT
  - WM.com
  - DOSSIA
  - Relay Health Communication
  - DSS Movement
- QA
  - DSS Data Load

Challenges

Current Week

Prior Week:
- None


HIPAA: HITECH and Electronic Access
Electronic Access to PHI
12/13/2013
Design Complete - EAHR
1/31/2014
EAHR Project QA Ends
5/31/2014
Rx1401 in Chain
11/1/2013
12/1/2013
1/1/2014
2/1/2014
3/1/2014
4/1/2014
5/1/2014
6/1/2014
7/1/2014
10/5/2013
7/4/2014
11/15/2013
Requirements Approved - EAHR
1/24/2014
Coding Ends - EAHR
2/10/2014
Release integration Testing Start
4/9/2014
Rx1401 Roll out begins
Measure of Success & Deliverables
Success Measures
Enable Electronic format of specified reports for customers
Key Deliverables (*Italics = completed)
11/15/2013 Requirements approval
12/20/2013 TAG Review
1/17/2014 Code Complete
1/31/2014 QA Complete
2/10/2014 Release integration Testing start
Purpose
Implementation of HITECH 3 requirements - Electronic access to PHI for patients
Updates
Current Week:
Prior Week:
Initial TAG Review for Electronic Access is scheduled for 12/20/2013.
PDF document conversion was successful in development this week.
Challenges
Current Week:
Prior Week:
None
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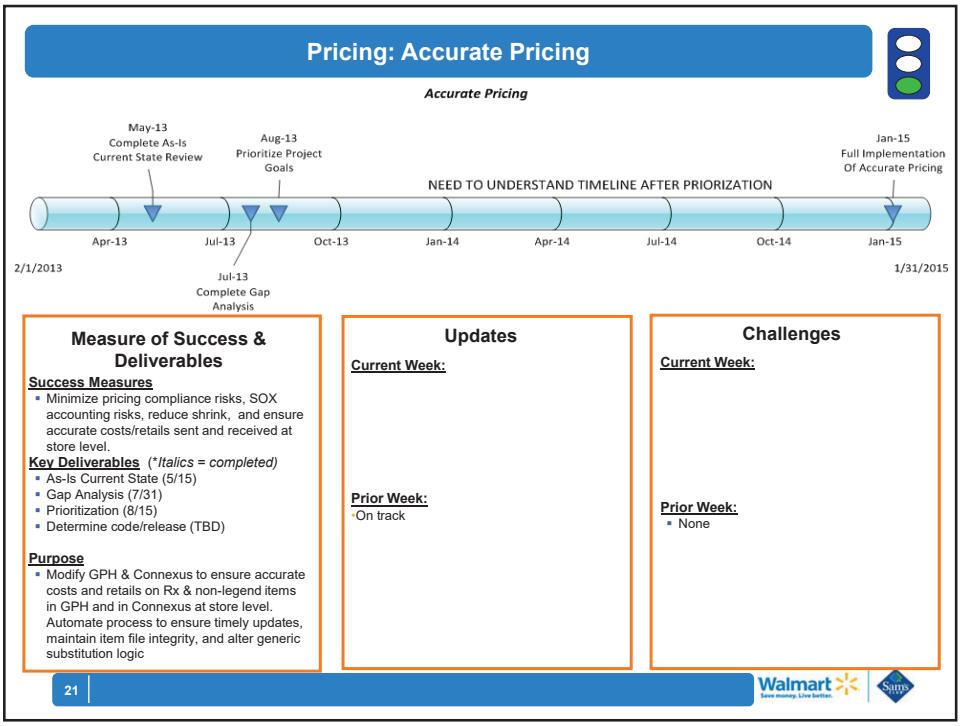
Pricing: Accurate Pricing
Accurate Pricing
May-13
Complete As-Is
Current State Review
Aug-13
Prioritize Project
Goals
Jan-15
Full Implementation
Of Accurate Pricing
NEED TO UNDERSTAND TIMELINE AFTER PRIORIZATION
Apr-13
Jul-13
Oct-13
Jan-14
Apr-14
Jul-14
Oct-14
Jan-15
2/1/2013
Jul-13
Complete Gap
Analysis
1/31/2015
Measure of Success & Deliverables
Success Measures
Minimize pricing compliance risks, SOX accounting risks, reduce shrink, and ensure accurate costs/retails sent and received at store level.
Key Deliverables (*Italics = completed)
As-Is Current State (5/15)
Gap Analysis (7/31)
Prioritization (8/15)
Determine code/release (TBD)
Purpose
Modify GPH & Connexus to ensure accurate costs and retails on Rx & non-legend items in GPH and in Connexus at store level. Automate process to ensure timely updates, maintain item file integrity, and alter generic substitution logic
Updates
Current Week:
Prior Week:
On track
Challenges
Current Week:
Prior Week:
None
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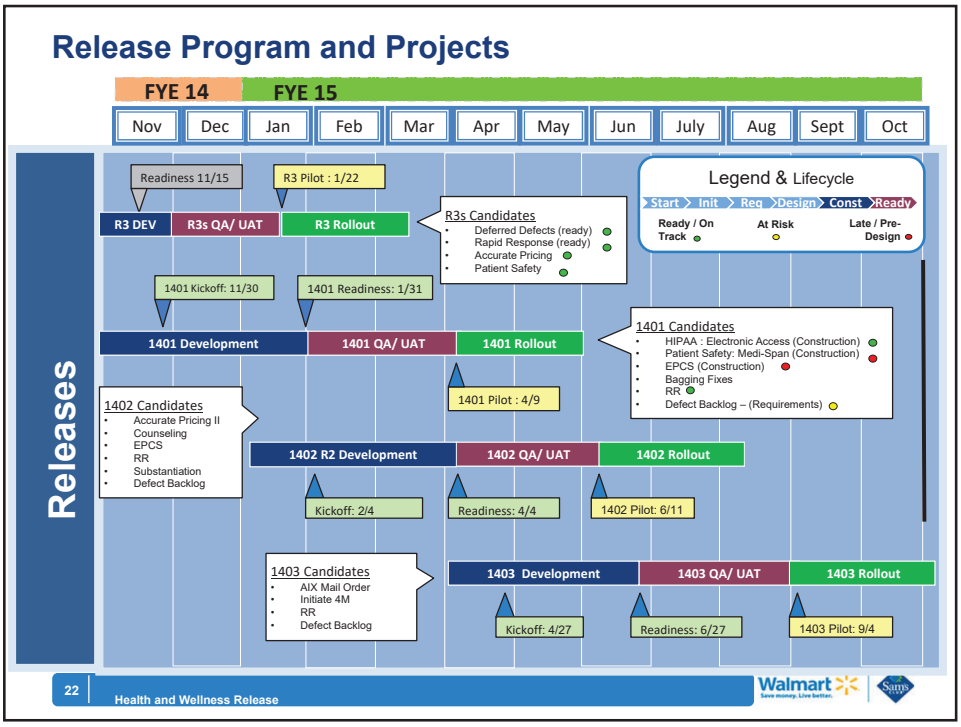
Release Program and Projects
FYE 14
FYE 15
Nov
Dec
Jan
Feb
Mar
Apr
May
Jun
July
Aug
Sept
Oct
Releases
Readiness 11/15
R3 Pilot : 1/22
R3 DEV
R3s QA/ UAT
R3 Rollout
R3s Candidates
Deferred Defects (ready)
Rapid Response (ready)
Accurate Pricing
Patient Safety
Legend & Lifecycle
Start
Init
Req
Design
Const
Ready
Ready / On Track
At Risk
Late / Pre-Design
1401 Kickoff: 11/30
1401 Readiness: 1/31
1401 Development
1401 QA/ UAT
1401 Rollout
1401 Candidates
HIPAA : Electronic Access (Construction)
Patient Safety: Medi-Span (Construction)
EPCS (Construction)
Bagging Fixes
RR
Defect Backlog – (Requirements)
1401 Pilot : 4/9
1402 Candidates
Accurate Pricing II
Counseling
EPCS
RR
Substantiation
Defect Backlog
1402 R2 Development
1402 QA/ UAT
1402 Rollout
Kickoff: 2/4
Readiness: 4/4
1402 Pilot: 6/11
1403 Candidates
AIX Mail Order
Initiate 4M
RR
Defect Backlog
1403 Development
1403 QA/ UAT
1403 Rollout
Kickoff: 4/27
Readiness: 6/27
1403 Pilot: 9/4
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Health and Wellness Release
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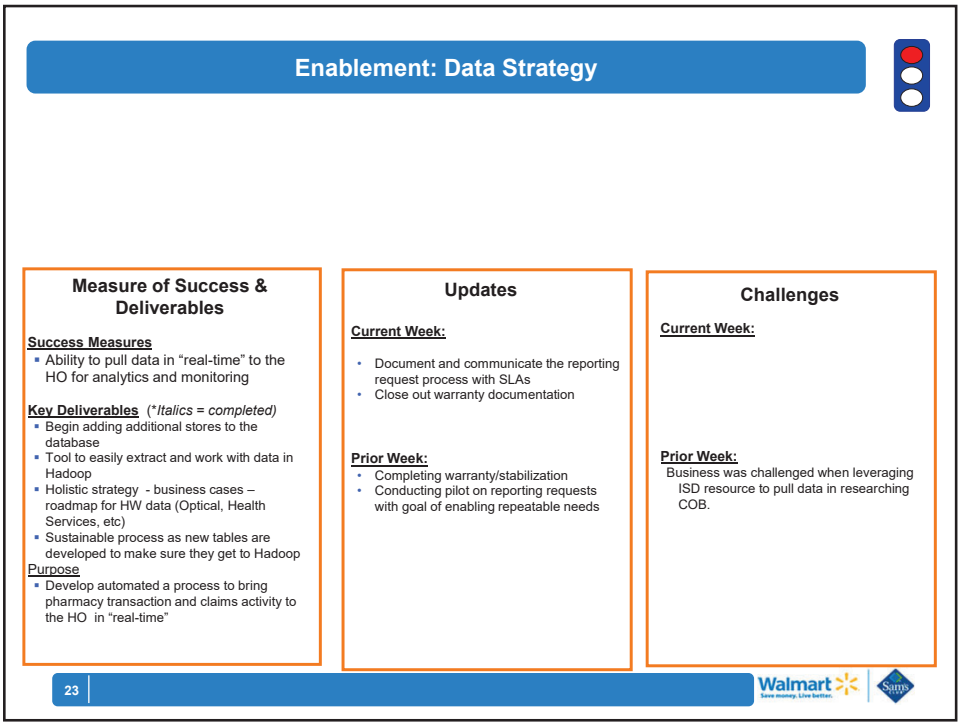
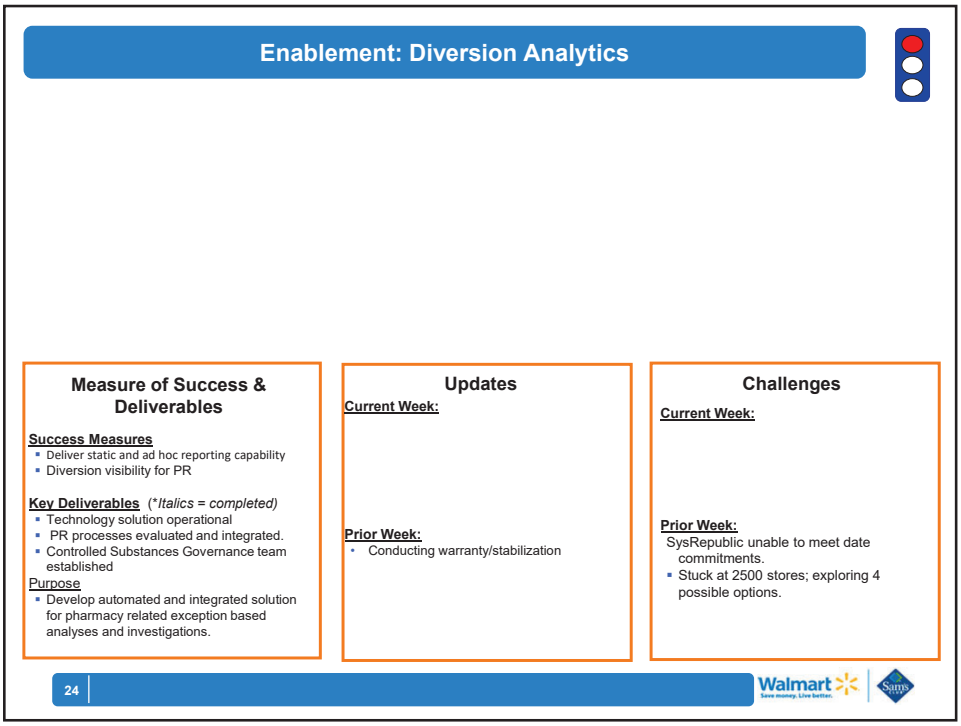
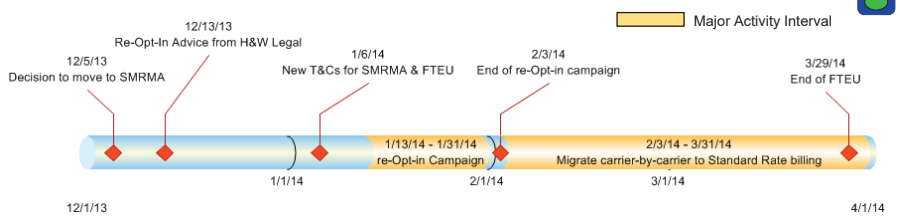

Enablement: Data Strategy
Measure of Success & Deliverables
Success Measures
Ability to pull data in "real-time" to the HO for analytics and monitoring
Key Deliverables (*Italics = completed)
Begin adding additional stores to the database
Tool to easily extract and work with data in Hadoop
Holistic strategy - business cases – roadmap for HW data (Optical, Health Services, etc)
Sustainable process as new tables are developed to make sure they get to Hadoop
Purpose
Develop automated a process to bring pharmacy transaction and claims activity to the HO in "real-time"
Updates
Current Week:
Document and communicate the reporting request process with SLAs
Close out warranty documentation
Prior Week:
Completing warranty/stabilization
Conducting pilot on reporting requests with goal of enabling repeatable needs
Challenges
Current Week:
Prior Week:
Business was challenged when leveraging ISD resource to pull data in researching COB.
23
Walmart
Sam's Club


Enablement: Diversion Analytics
Measure of Success & Deliverables
Success Measures
Deliver static and ad hoc reporting capability
Diversion visibility for PR
Key Deliverables (*Italics = completed)
Technology solution operational
PR processes evaluated and integrated.
Controlled Substances Governance team established
Purpose
Develop automated and integrated solution for pharmacy related exception based analyses and investigations.
Updates
Current Week:
Prior Week:
Conducting warranty/stabilization
Challenges
Current Week:
Prior Week:
SysRepublic unable to meet date commitments.
Stuck at 2500 stores; exploring 4 possible options.
24
Walmart
Sam's Club

Ready Alerts Compliance Project: Timeline



Measure of Success & Deliverables

Success Measures

- Eliminate legal and compliance risks by moving Ready Alerts subscribers to Standard Message Rates May Apply

Key Deliverables

- Inactivate subscribers who have not filled a Rx within the last "X" number of months
- Communicate new T&Cs to "active" subscribers (i.e. Rx filled within the last "X" number of months)
- Re-Opt-in or Opt-out subscribers based on their reply to the "Standard Message Rates May Apply" (SMRMA) campaign

Updates

Current Week:

Prior Week:

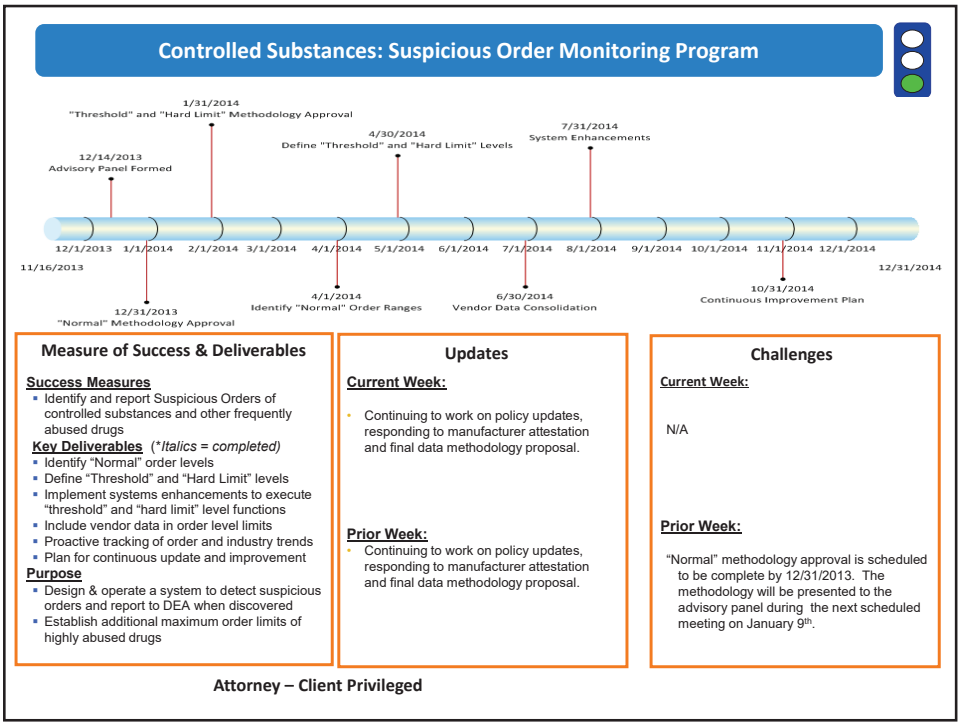
- PRF submitted to ISD for Level-of-Effort estimate
- Kick-off meeting with H&W Operations to discuss project timelines and action items
- Determined not a compliance funded project

Challenges

New Roadblocks/Risks:

Known Roadblocks/Risks:

- ISD resources needed
- We don't have a signed contract with AT&T for Standard Message Rates. VMO and AT&T are in current negotiations addressing other message platform risks.


Controlled Substances: Suspicious Order Monitoring Program
1/31/2014
"Threshold" and "Hard Limit" Methodology Approval
4/30/2014
Define "Threshold" and "Hard Limit" Levels
7/31/2014
System Enhancements
12/14/2013
Advisory Panel Formed
12/1/2013 1/1/2014 2/1/2014 3/1/2014 4/1/2014 5/1/2014 6/1/2014 7/1/2014 8/1/2014 9/1/2014 10/1/2014 11/1/2014 12/1/2014
11/16/2013
12/31/2014
12/31/2013
"Normal" Methodology Approval
4/1/2014
Identify "Normal" Order Ranges
6/30/2014
Vendor Data Consolidation
10/31/2014
Continuous Improvement Plan
Measure of Success & Deliverables
Success Measures
Identify and report Suspicious Orders of controlled substances and other frequently abused drugs
Key Deliverables (*Italics = completed)
Identify "Normal" order levels
Define "Threshold" and "Hard Limit" levels
Implement systems enhancements to execute "threshold" and "hard limit" level functions
Include vendor data in order level limits
Proactive tracking of order and industry trends
Plan for continuous update and improvement
Purpose
Design & operate a system to detect suspicious orders and report to DEA when discovered
Establish additional maximum order limits of highly abused drugs
Updates
Current Week:
Continuing to work on policy updates, responding to manufacturer attestation and final data methodology proposal.
Prior Week:
Continuing to work on policy updates, responding to manufacturer attestation and final data methodology proposal.
Challenges
Current Week:
N/A
Prior Week:
"Normal" methodology approval is scheduled to be complete by 12/31/2013. The methodology will be presented to the advisory panel during the next scheduled meeting on January 9th.
Attorney – Client Privileged

Prescriber Validation: Timeline

Measure of Success & Deliverables

Success Measures Transparent replacement of the RelayHealth Prescriber content on Host

Key Deliverables (**Italics = completed*)

- Contract completion
- ISD Project completion (Requirements, Scope, etc…)
- Complete replacement of data files
- Timeline – Start end of December with completion in January 2014 for February 2014 implementation

Updates

Current Week:

Prior Week:

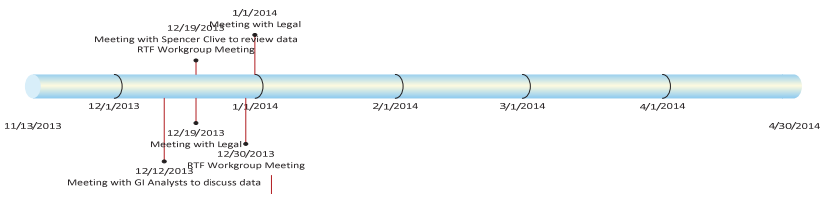
- 12/16/13 – Contract with HMS signed
- 12/17/13 – Kickoff call with ISD and HMS to determine how various situations will be handled.

Challenges

Current Week:

Prior Week:

Refusal to Fill: Timeline



Measure of Success & Deliverables

Success Measures

- Fulfill all obligations of the DEA MOA.
- Deliver a process for the analysis of refusal to fill data.
- Deliver a process for reporting problematic prescribers or patients internally.

Key Deliverables (**Italics = completed*)

- Determine where to house the data.
- Determine what program to use to analyze the data.
- Determine how to disseminate refusal to fill decisions and/or problematic prescribers and patients within the same trade area or to the entire corporate entity.
- Engage key stakeholders to determine if pharmacists may exercise their discretion to impose blanket refusals .

Updates

Current Week:

- Meeting held on 12/30 with RTF Workgroup to discuss RTF options from meeting with legal.
- Meeting held on 12/31 to further discuss RTF Options with Legal.

Prior Week:

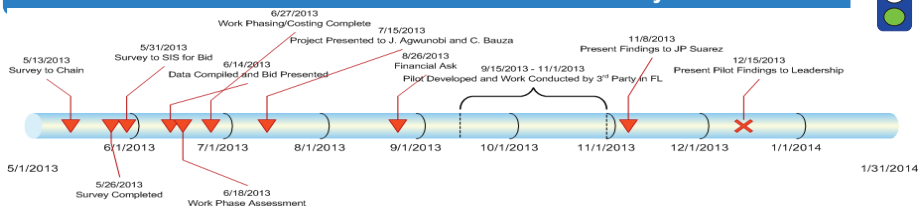
- Held workgroup meeting 12/17 to discuss learnings and next steps from analyst meetings.
- Discussed the future of RTF Webform with Operations (Steve Cox) on 12/17.
- Meeting on 12/20 to discuss RTF options with legal.

Challenges

Current Week:

Prior Week:

Controlled Substances: CCTV – Pharmacy



Measure of Success & Deliverables

Success Measures

- Clarification of Standards to meet our obligations with DEA MOA
- Meet Obligations of DEA MOA

Key Deliverables (*Italics = completed)*

- *Survey completion deadline: 5/26*
- *Report Findings and work phasing in the Compliance Focus Meeting: 6/27*
- *Project presented to Carmen Bauza and John Agwunobi: 7/15*
- *Financial Ask presented to JP Suarez 8/26*
- *Pilot conductd in FL to determine costs. 11-8*
- *Present costing validation based on results of pilot, to Leadership by 12/15..*
- Develop training for AP/HWMD regarding camera placement & camera relocation.
- Develop guidelines for each Pharmacy Proto showing correct placement of cameras.
- Develop budget for project showing completion of work by FY15 including remodel program and optimizations.

Updates

Current Week:

No Update

Prior Week:

- Development of guidelines by Proto Type will be completed by 12/20
- Budget request with optimizations applied to be completed by 12/20
- Development Webinar for Training program for camera placement ongoing to be completed by 2/1.
- Still on track to rollout 12 month work program to complete project beginning 2/1/14

Challenges

Current Week:

No Update

Prior Week:

- Funding determination by RE Leadership in Jan14.

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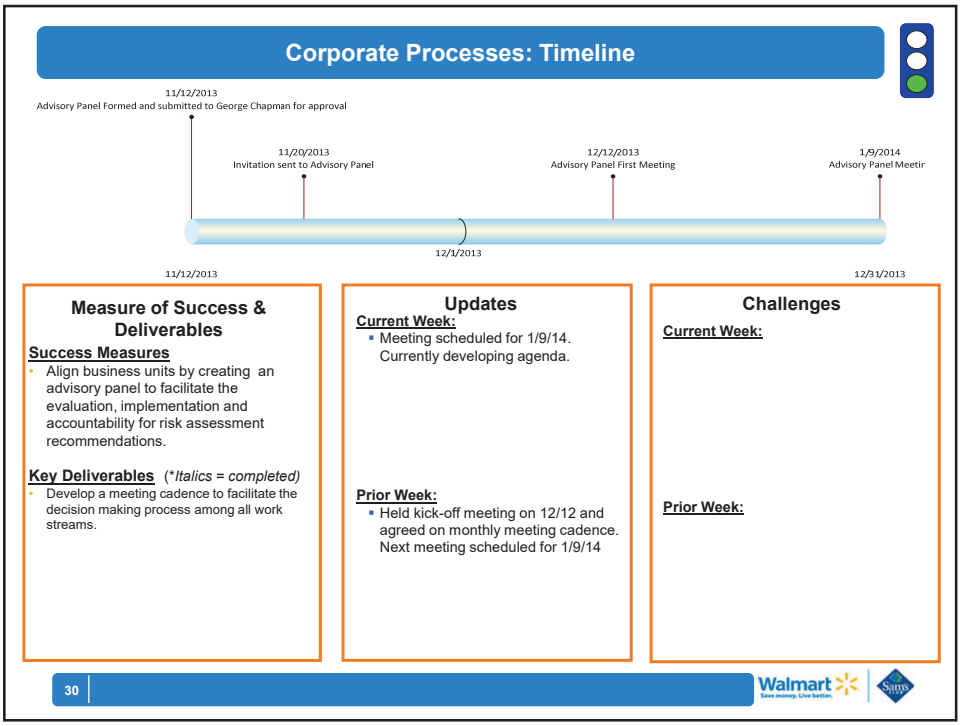
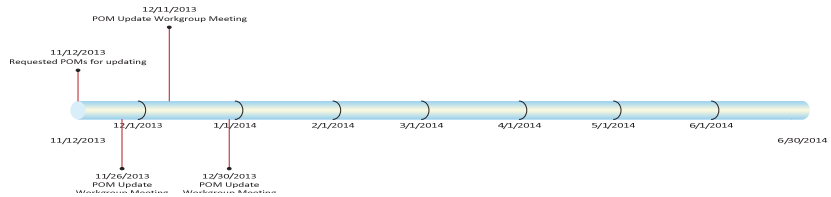

Corporate Processes: Timeline
11/12/2013
Advisory Panel Formed and submitted to George Chapman for approval
11/20/2013
Invitation sent to Advisory Panel
12/12/2013
Advisory Panel First Meeting
1/9/2014
Advisory Panel Meetir
12/1/2013
11/12/2013
12/31/2013
Measure of Success & Deliverables
Success Measures
Align business units by creating an advisory panel to facilitate the evaluation, implementation and accountability for risk assessment recommendations.
Key Deliverables (*Italics = completed)
Develop a meeting cadence to facilitate the decision making process among all work streams.
Updates
Current Week:
Meeting scheduled for 1/9/14. Currently developing agenda.
Prior Week:
Held kick-off meeting on 12/12 and agreed on monthly meeting cadence. Next meeting scheduled for 1/9/14
Challenges
Current Week:
Prior Week:
30
Walmart
Sam's Club

POM updates & Revisions: Timeline



Measure of Success & Deliverables

Success Measures

- Align policies with current DEA/Regulatory guidance, as prescribed by attorney work product, to ensure consistency in execution.

Key Deliverables (**Italics = completed)*

- Update POMs based on attorney work product.
- Present to advisory panel for approval.
- Collaborate with key stakeholders for posting to the WIRE.

Updates

Current Week:

- POM Update workgroup meeting held on 12/30 and revisions to POMs were completed.
- Currently finishing the revision "clean-up" to send POMs for review by legal and the advisory panel.

Prior Week:

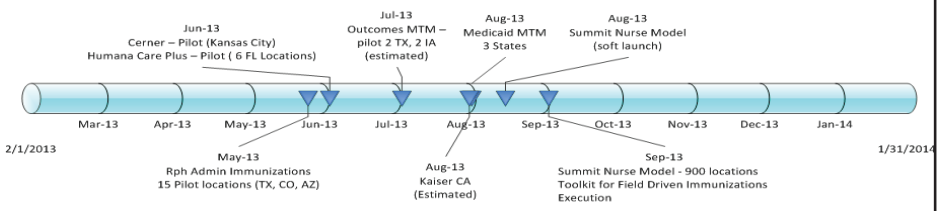
- Additional POM Update workgroup meeting scheduled 12/30 to address remaining POMs (as per the attorney work product).

Challenges

Current Week:

Prior Week:

Health Services: Immunizations



Measure of Success & Deliverables

Success Measures
- Drive traffic in-store

Key Deliverables (**Italics = completed)*
- Launch dates listed above

Purpose
- Deliver most affordable medical care to Walmart customers the way they want it, when they need it.

Updates

Current Week:

Prior Week:
No Updates Provided

Challenges

Current Week:

Prior Week:
STC site visit went well—pushing through contract and additional SRCR pieces to finalize to get the solution in store.

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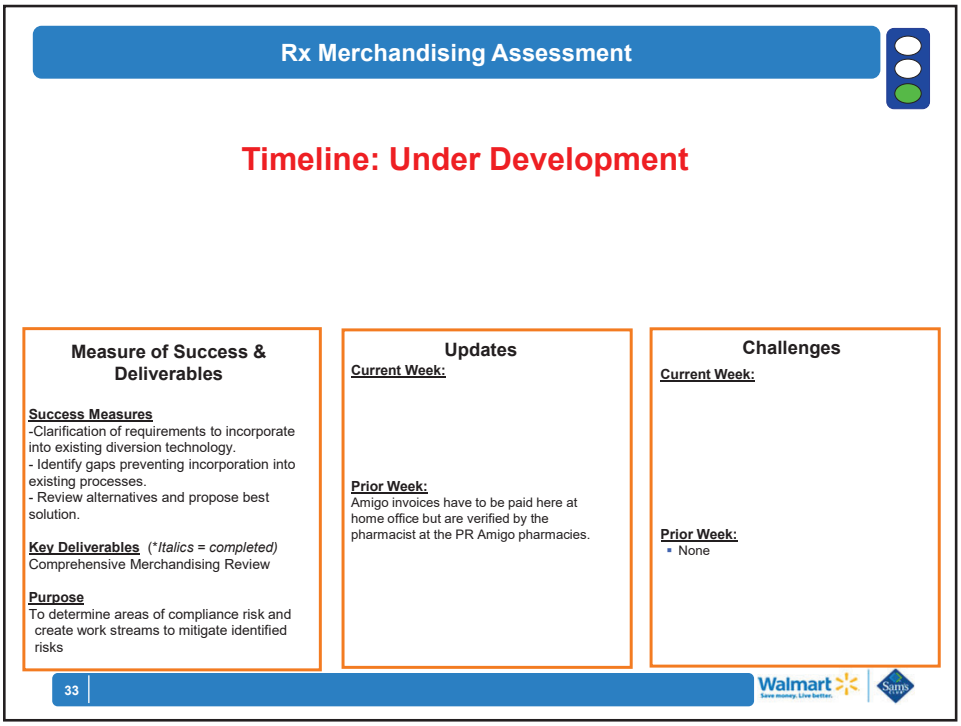
Rx Merchandising Assessment
Timeline: Under Development
Measure of Success & Deliverables
Success Measures
-Clarification of requirements to incorporate into existing diversion technology.
- Identify gaps preventing incorporation into existing processes.
- Review alternatives and propose best solution.
Key Deliverables (*Italics = completed)
Comprehensive Merchandising Review
Purpose
To determine areas of compliance risk and create work streams to mitigate identified risks
Updates
Current Week:
Prior Week:
Amigo invoices have to be paid here at home office but are verified by the pharmacist at the PR Amigo pharmacies.
Challenges
Current Week:
Prior Week:
None
33
Walmart
Sam's Club

P/R RX Drug Diversion Risk Assessment

Timeline: Under Development

Measure of Success & Deliverables

Success Measures
-TBD once analysis is completed

Key Deliverables (*Italics = completed)*
- P/R diversion risk assessment & strategy

Purpose
-To determine steps/technologies required to provide complete visibility to P/R processes for diversion mitigation.

Updates

Current Week:

Prior Week:
No Updates Provided

Challenges

Current Week:

Prior Week:

- - Due to weather, Supplylogix has been slow to respond.
- They did confirm EDI file could capture needed info, but no details.
- Very cryptic regarding EDI feed as a separate feed.

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PR Recalls Assessment

Timeline: Under Development

Measure of Success & Deliverables

Success Measures
TBD once analysis is completed

Key Deliverables
TBD once analysis is completed

Purpose
ID gaps in PR RX/OTC product recall processes

Updates

Current Week:

Prior Week:
No Updates Provided

Challenges

Current Week:

Prior Week:

Walmart
Save money. Live better.
Sam's Club
NEW BUSINESS??
Walmart Compliance
The Right Way, Every Day!
Service • Respect • Excellence

Walmart
Save money. Live better.
Sam's Club
"CEO" OF THE WEEK
Walmart Compliance
The Right Way, Every Day!
Service • Respect • Excellence